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FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

CELA

MUR: 6777

DATE COMPLAINT FILED: January 30, 2014

DATE OF NOTIFICATION: February 6, 2014

DATE OF LAST RESPONSE:

June 19, 2014

DATE ACTIVATED: July 16, 2014

ELECTION CYCLE: 2014

EXPIRATION OF SOL:

January 16, 2019 (earliest)

January 25, 2019 (latest)<sup>1</sup>

COMPLAINANT:

Chad Heywood, Executive Director  
Arizona Republican Party

RESPONDENTS:

Kirkpatrick for Arizona and Daniel A. Flores in his  
official capacity as treasurer  
House Majority PAC and Shannon Roche in her  
official capacity as treasurer

RELEVANT STATUTES  
AND REGULATIONS:

52 U.S.C. § 30104(b)<sup>2</sup>

52 U.S.C. § 30116(a), (f)

52 U.S.C. § 30118

11 C.F.R. § 109.21

11 C.F.R. § 109.23

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

<sup>1</sup> The latest statute of limitations date is based on the last expenditure that House Majority PAC made in connection with the Congressional race involving Ann Kirkpatrick, as listed in its disclosure reports filed with the Commission. As discussed *infra*, based on publicly available information it appears that these expenditures relate to the ad at issue in this matter.

<sup>2</sup> On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act"), was transferred from Title 2 of the United States Code to new Title 52 of the United States Code.

**I. INTRODUCTION**

This matter concerns allegations that House Majority PAC made an excessive or prohibited in-kind contribution to Kirkpatrick for Arizona (the "Committee"), the principal campaign committee of Congressional candidate Ann Kirkpatrick, by republishing the Committee's campaign materials in a television advertisement. Specifically, the Complaint alleges that House Majority PAC's costs with respect to the advertisement at issue are illegal contributions to Kirkpatrick and the Committee because House Majority PAC is an independent expenditure-only committee that is prohibited from making a direct or in-kind contribution to a federal campaign committee.<sup>3</sup> The Complaint does not allege that the republication of materials was coordinated with the candidate or the Committee but states that Kirkpatrick and the Committee were prohibited from receiving this "illegal contribution."

We recommend that the Commission find reason to believe that House Majority PAC violated 52 U.S.C. §§ 30116(a) (formerly 2 U.S.C. § 441a(a)), 30118(a) (formerly 2 U.S.C. § 441b(a)), and 30104(b) (formerly 2 U.S.C. § 434(b)), by making excessive and prohibited in-kind contributions to the Committee when it republished campaign materials, and by failing to disclose the expenditures as contributions to the Committee. Because the available information indicates that House Majority PAC obtained the video footage from a publicly available source and not in coordination with the Committee, we recommend that the Commission find no reason to believe that the Committee violated 52 U.S.C. §§ 30116(f) (formerly 2 U.S.C. § 441a(f)) or 30118(a) (formerly 2 U.S.C. § 441b(a)) by accepting excessive or prohibited in-kind contributions from House Majority PAC.

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<sup>3</sup> Compl. at 3.

II. FACTUAL AND LEGAL ANALYSIS

A. Factual Background

Ann Kirkpatrick was a candidate in the 2012 general election for Arizona's First Congressional District.<sup>4</sup> On June 26, 2012, the Committee released video footage of Kirkpatrick on YouTube.<sup>5</sup> The silent video consists of three minutes and eighteen seconds of raw footage of the candidate on various campaign stops interacting with various constituencies, including ranchers, law enforcement officers, and senior citizens.

On January 16, 2014, House Majority PAC, an independent expenditure-only political committee,<sup>6</sup> began airing a 29-second television advertisement entitled "Listens" that included the same Committee footage from the June 2012 YouTube video.<sup>7</sup> The advertisement, which contained an audio track, begins with images of street views and another image of a lone vehicle traveling on a dirt road accompanied by the statement "[i]t's here. In small towns and wide open

<sup>4</sup> Kirkpatrick was elected on November 6, 2012. On January 8, 2013, Kirkpatrick filed her Statement of Candidacy with the Commission for the 2014 general election.

<sup>5</sup> See <http://www.youtube.com/watch?v=ph9jdoQSiI0>.

<sup>6</sup> House Majority PAC registered as an independent expenditure-only committee with the Commission on April 8, 2011, indicating that it "intends to raise funds in unlimited amounts" but that it "will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees." See <http://images.nictusa.com/pdf/035/11030591035/11030591035.pdf>. It has not established a separate account for contributions subject to the limitations and prohibitions of the Act. See Stipulated Order and Consent Judgment in *Carey v. FEC*, No. 11-259-RMC (Aug. 19, 2011); see also FEC Statement on *Carey v. FEC*: Reporting Guidance for Political Committees that Maintain a Non-Contribution Account (Oct. 5, 2011), <http://www.fec.gov/press/Press2011/20111006postcarey.shtml>. House Majority PAC was also a respondent in two additional matters involving allegations that it republished a candidate's campaign materials by using footage from the candidate's YouTube page in its own ads. See First Gen. Counsel's Rpt. at 3, MUR 6617 (Christie Vilsack for Iowa), and First Gen. Counsel's Rpt. at 2, MUR 6667 (Friends of Cheri Bustos). In both matters, the Commission was equally divided on the Office of General Counsel's recommendations to find reason to believe that an excessive contribution resulted from the republication, and it closed the respective files.

<sup>7</sup> Compl. at 2. House Majority PAC Resp. at 1 (Mar. 27, 2014) (stating that it began airing the ad in January 2014). See House Majority PAC, "Listens," YouTube (Jan. 16, 2014), <http://www.youtube.com/watch?v=wlv-YvK7198>. Press articles indicate that the ad first aired on Thursday, January 16, 2014. See Alex Isenstadt, *House Majority PAC goes after Koch brothers*, Politico.com (Jan. 15, 2014), available at <http://www.politico.com/story/2014/01/house-majority-pac-koch-brothers-102241.html>.

1 spaces." The ad continues with the audio statement "[t]hat Kirkpatrick listens and learns,"  
2 accompanied by images taken from the Committee's YouTube video footage of Kirkpatrick  
3 interacting with ranchers and a group of men near a roadway, one of whom is a law enforcement  
4 officer.<sup>8</sup> Later in the ad, the narrator speaks favorably of Kirkpatrick, noting that "she blew the  
5 whistle on the disastrous healthcare website calling it 'stunning ineptitude' and worked to fix it."  
6 The ad shows another segment from the Committee's original video footage of Kirkpatrick  
7 meeting with senior citizens at a picnic table.<sup>9</sup> The ad concludes with more Committee video  
8 footage, displaying a series of images in which Kirkpatrick speaks with a group of four men (two  
9 of whom are law enforcement officers), talks with a girl on haystacks, and looks directly into the  
10 camera at close-up range.<sup>10</sup> The corresponding audio states that "[s]he fought to hold insurance  
11 companies accountable so they can't deny coverage for preexisting conditions or drop coverage  
12 when you get sick. Ann Kirkpatrick. Seeing what's wrong. Doing what's right."<sup>11</sup> In sum, the  
13 Committee footage appears for at least 14 seconds of the 29-second ad.<sup>12</sup>

14 The relevant independent expenditure reports filed with the Commission indicate that  
15 House Majority PAC paid \$205,302 in costs related to the ad at issue on January 15 and

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<sup>8</sup> These images appear from the :04 mark to the :09 mark of the "Listens" ad; the Committee shows the same images on the video footage displayed on YouTube at the :30 mark. *See* <http://www.youtube.com/watch?v=ph9jdoQSiI0>.

<sup>9</sup> These images appear from approximately the :12 mark to the :14 mark of the "Listens" ad. The Committee footage shows the same footage at the one minute mark. Compl. at 2. *See* <http://www.youtube.com/watch?v=ph9jdoQSiI0>.

<sup>10</sup> These images appear from the :22 mark to the :29 mark of the "Listens" ad. The Committee footage displays the exact images at the 2:37 mark (Kirkpatrick walking alongside the mountain-view roadway with law enforcement officers), :41 mark (Kirkpatrick sitting on a haystack talking with a girl), and the 2:59 mark (Kirkpatrick looking directly at the camera) respectively. *Id.*

<sup>11</sup> Compl. at Attach. I (providing transcript of the "Listens" ad along with the Complaint), available at <http://www.thehousemajoritypac.com/our-work/arizona/ann-kirkpatrick-listens>.

<sup>12</sup> *Supra* notes 8-11.

1 January 25, 2014.<sup>13</sup> The expenditures were reported as follows:

DATE	AMOUNT	VENDOR	PURPOSE
1/15/2014	\$13,426.32	Ralston Lapp Media	Estimated Media Production Costs
1/15/2014	\$124,941.23	Waterfront Strategies	Television Advertising
1/25/2014	\$66,934.47	Waterfront Strategies	Television Advertising

2  
3 The Complaint asserts that House Majority PAC used the Committee's footage and  
4 describes the specific video images of Kirkpatrick in the "Listens" ad that are identical to  
5 segments of the original Committee video.<sup>14</sup> In its Response, House Majority PAC  
6 acknowledges that it aired "Listens" on television to praise the Congresswoman for listening to  
7 the concerns of her constituents, but claims that it "created, produced, and disseminated the  
8 advertisement independently of any candidate or political party committee."<sup>15</sup> It argues that the  
9 incidental use of the Committee's video footage "does not constitute 'republication,' particularly  
10 where . . . the excerpts do not contain any discernible message of their own and are used solely to  
11 provide background imagery."<sup>16</sup> House Majority PAC further states that the Committee video  
12 footage was "incorporated into a communication in which [the respondent] add[ed] its own text,  
13 graphics, audio, and narration to create its own message."<sup>17</sup> The Response further argues that the  
14 application of the republication standard to find that House Majority PAC has made a  
15 contribution to the Committee reflects a "seeming incongruity" between how the Act and

<sup>13</sup> See House Majority PAC 24/48 Hour Notices of Independent Expenditures (Jan. 15, 2014 and Jan. 25, 2014).

<sup>14</sup> *Id.* Compl. at 2.

<sup>15</sup> House Majority PAC Resp. at 1.

<sup>16</sup> *Id.* at 2.

<sup>17</sup> *Id.* at 3. (quoting Statement of Reasons, Comm'rs. Hunter, McGahn & Petersen at 8, MUR 6357 (American Crossroads) (Feb. 22, 2012)). See also Statement of Reasons, Comm'rs Hunter and Petersen, MURs 6617 (Christie Vilsack for Iowa) and 6667 (Friends of Cheri Bustos) at 1 (Dec. 2, 2013).

1 Commission regulations treat republication, with the former stating that republication materials  
2 shall be considered an expenditure, and the latter stating that such materials results in a  
3 contribution to the benefiting candidate.<sup>18</sup> It also claims that it “relied reasonably” on  
4 Commission precedents that dismissed complaints alleging that the use of campaign photos or  
5 videos as background images constituted republication, and that given these dismissals, to make  
6 a finding against House Majority PAC would be unfair and amount to “disparate treatment of  
7 persons in similar circumstances.”<sup>19</sup>

8 The Committee submitted a separate response requesting a dismissal and stating that the  
9 Commission erred in naming it as a respondent because the Complaint does not allege that the  
10 Committee violated the Act.<sup>20</sup> It also notes that the Complaint does not allege any conduct  
11 necessary to constitute a coordinated communication.<sup>21</sup>

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<sup>18</sup> House Majority PAC Resp. at 3-4.

<sup>19</sup> *Id.* at 4. In support of the “reliance” and “incongruity” points, the House Majority PAC’s Response relies, in part, on the analysis from the Statements of Reasons of Commissioners Hunter, McGahn and Petersen in MURs 5879 (Democratic Congressional Campaign Comm.) (Feb. 28, 2012) (“DCCC”) and 6357 (American Crossroads) (noting the “seeming incongruity” between how the Act and Commission regulations treat republication as an expenditure (the Act) and a contribution (Commission regulations)) and the Statements of Reasons of Commissioners Hunter and Petersen in MURs 6617 (Christie Vilsack for Iowa) and 6667 (Friends of Cheri Bustos), matters where the Commission considered allegations of republication. *See* House Majority PAC Resp. at 2-3. The Commission was equally divided whether to conciliate with the DCCC in MUR 5879 or to find reason to believe that American Crossroads violated the Act in MUR 6357 on a republication theory. *Cf.* Statement of Reasons, Comm’rs. Weintraub, Bauerly & Walther at 1 n.1, MUR 6357 (American Crossroads) (Feb. 27, 2013). The Commission was also equally divided on whether to find reason to believe that House Majority PAC violated the Act in MURs 6617 (Christie Vilsack for Iowa) and MUR 6667 (Friends of Cheri Bustos).

<sup>20</sup> Committee Resp. at 1-2 (June 19, 2014).

<sup>21</sup> *Id.* at 2.

**B. Legal Analysis**

Under the Act, the “financing by any person of the dissemination, distribution or republication, in whole or *in part*, of any broadcast or any written, graphic, or other form of campaign materials prepared by the candidate’s authorized committee, or authorized agents shall be considered an expenditure.”<sup>22</sup> The republication of campaign materials prepared by a candidate’s authorized committee is also “considered a[n in-kind] contribution for the purposes of contribution limitations and reporting responsibilities of the person making the expenditure.”<sup>23</sup> The Commission treats expenditures for republished campaign materials as in-kind contributions because the person financing the republication “has provided something of value to the candidate [or] authorized committee.”<sup>24</sup>

The Commission created an exemption for grassroots activity on the Internet that allows individuals to republish campaign materials available on the Internet without making a contribution or expenditure.<sup>25</sup> The exception, however, does not exempt from the definition of

<sup>22</sup> 52 U.S.C. § 30116(a)(7)(B)(iii) (formerly 2 U.S.C. § 441a(a)(7)(B)(iii)) (emphasis added). For republication, the Commission has concluded that “campaign materials” include any material belonging to or emanating from a campaign. *See, e.g.*, MUR 5743 (Betty Sutton) (candidate photo obtained from campaign website); MUR 5672 (Save American Jobs) (video produced and used by candidate’s campaign subsequently hosted on association’s website).

<sup>23</sup> 11 C.F.R. § 109.23.

<sup>24</sup> *See* Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 442 (Jan. 3, 2003) (explanation and justification) (“Coordinated and Independent Expenditures E&J”). As the Commission there explained, “Congress has addressed republication of campaign material through 52 U.S.C. § 30116(a)(7)(B)(iii) (formerly 2 U.S.C. § 441a(a)(7)(B)(iii)) in a context where the candidate/author generally views the republication of his or her campaign materials, *even in part*, as a benefit” and “can be reasonably construed only as for the purpose of influencing an election.” *Id.* at 443 (emphasis added); *see also* Coordinated Communications, 71 Fed. Reg. 33,190, 33,191 (June 8, 2006) (explanation and justification), (“Coordination E&J”) (communications “that disseminate, distribute, or republish campaign materials, no matter when such communications are made, can be reasonably construed only as for the purpose of influencing an election.”).

<sup>25</sup> *See* 11 C.F.R. §§ 100.94. and 100.155 (uncompensated internet activity does not result in a contribution or expenditure); Internet Communications, 71 Fed. Reg. 18,589, 18,604 (Apr. 12, 2006) (explanation and justification).

1 “contribution” any “public communication” that involves the republication of such materials.<sup>26</sup>  
2 For example, a contribution would result “if an individual downloaded a campaign poster from  
3 the Internet and then paid to have the poster appear as an advertisement in the New York  
4 Times.”<sup>27</sup>

5 Here, House Majority PAC disseminated campaign materials produced by the Committee  
6 when it aired the “Listens” ad on television. House Majority PAC admits to obtaining the  
7 footage of Kirkpatrick directly from the Committee’s YouTube video footage, and paying for  
8 production costs and air time to broadcast the ad on television, which features some of that  
9 footage. By republishing this footage, which amounted to at least 14 seconds of a 29-second ad,  
10 House Majority PAC made an in-kind contribution to the Committee.<sup>28</sup>

11 Nonetheless, House Majority PAC contends that its use of the Committee footage does  
12 not constitute republication because that footage is simply an “incidental” part of the relevant  
13 advertisement, and served merely as background for the advertisement.<sup>29</sup> But the plain language  
14 of the statute and Commission regulation provides that the use “in whole or in part,” of any  
15 campaign material prepared by the campaign is republication and will result in an in-kind  
16 contribution.<sup>30</sup> And the Commission has previously determined that materials are republished  
17 under the Act even when the value of the republication is *de minimis* or the republished portion  
18 is an incidental part of the communication. In such cases, the *de minimis* or incidental nature of

<sup>26</sup> A “public communication” is defined as a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing or telephone bank, or any other form of general political advertising. 11 C.F.R. § 100.26.

<sup>27</sup> See 71 Fed. Reg. at 18,604.

<sup>28</sup> See 11 C.F.R. § 109.23(a).

<sup>29</sup> House Majority PAC Resp. at 2.

<sup>30</sup> See 52 U.S.C. § 30116(a)(7)(B)(iii) (formerly 2 U.S.C. § 441a(a)(7)(B)(iii)) and 11 C.F.R. § 109.23.



1 the republication is considered in determining the appropriate Commission response to the  
2 violation, not whether a violation has occurred.<sup>31</sup> Moreover, in its 2003 rulemaking, the  
3 Commission specifically rejected a request to "permit the republication of campaign slogans and  
4 other limited portions of campaign materials for analysis and other uses."<sup>32</sup> The Commission  
5 explained that such an exception could "swallow the rule."<sup>33</sup>

6 Indeed, the republished campaign materials here were not an incidental part of House  
7 Majority PAC's advertisements in any event. Rather, the republished campaign footage  
8 comprises roughly half of the 29-second communication. Further, the Committee's footage  
9 reflects the *only* visual depiction of the relevant candidate that is the subject of the  
10 communication. As such, the footage appears to constitute a core component of the  
11 advertisement and is hardly incidental.

12 House Majority PAC also argues that it merely incorporated the Committee's footage  
13 into its communication to create its own message.<sup>34</sup> But here, the video footage of Kirkpatrick  
14 obtained from the Committee remains unchanged in the House Majority PAC advertisement.  
15 And unlike a photo that is fleetingly displayed in a subsequent communication, the Committee's  
16 unaltered video footage constitutes a central part of the advertisement. Moreover, any  
17 subsequent republication of campaign material by a third party could be said to constitute the  
18 republisher's "own message;" thus, to construe the Act and regulations so narrowly would render  
19 republication a nullity. Indeed, the Commission observed as much in its related rulemaking

<sup>31</sup> See MUR 5743 (Betty Sutton) (Commission admonished a committee after determining that a republished candidate photo was incidental and likely *de minimis* value); MUR 5996 (Tim Bee) (Commission exercised prosecutorial discretion to dismiss the allegation that a group republished photo of a candidate that comprised two seconds of a 30 second ad, and was downloaded at no charge from candidate's publicly available website).

<sup>32</sup> Coordination and Independent Expenditures E&J, 68 Fed. Reg. at 443 (Jan. 3, 2003).

<sup>33</sup> *Id.*

<sup>34</sup> House Majority PAC Resp. at 3.

1 proceedings when it rejected an analogous “fair use” exception that suffered from the same  
2 failing.<sup>35</sup> Accordingly, based on the Act’s instruction that use of a candidate’s campaign  
3 materials — even “*in part*” — constitutes republication, we conclude that House Majority PAC  
4 republished campaign materials and “provided something of value to the candidate [or]  
5 authorized committee.”<sup>36</sup>

6 Therefore, we recommend that the Commission find reason to believe that House  
7 Majority PAC violated 52 U.S.C. §§ 30116(a) (formerly 2 U.S.C. § 441a(a)), 30118(a) (formerly  
8 2 U.S.C. § 441b(a)), and 30104(b) (formerly 2 U.S.C. § 434(b)), by making prohibited and  
9 excessive in-kind contributions to the Committee when it republished its campaign materials,

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<sup>35</sup> Coordination E&J, 68 Fed. Reg. at 443 (rejecting “fair use” proposal that would permit republication of “limited portions of campaign materials *for analysis and other uses*,” reasoning that such an approach “could swallow the rule”) (emphasis added).

<sup>36</sup> 52 U.S.C. § 30116(a)(7)(B)(iii) (emphasis added)(formerly 2 U.S.C. § 441a(a)(7)(B)(iii)); Coordination and Independent Expenditures E&J, 68 Fed. Reg. at 442-43 (acknowledging that Congress concluded that republication even in part provides a benefit to the candidate).

1 and by failing to disclose the expenditures as contributions to the Committee.<sup>37</sup>

2 We recommend, however, that the Commission find no reason to believe that the  
3 Committee violated the Act. As the recipient of an alleged republication benefit, the candidate  
4 or committee that prepared the original video footage of the candidate "does not receive or  
5 accept an in-kind contribution, and is not required to report an expenditure, unless the  
6 dissemination, distribution, or republication of campaign materials is a coordinated  
7 communication under 11 C.F.R. § 109.21 or a party coordinated communication under 11 C.F.R.  
8 § 109.37."<sup>38</sup> The Complaint does not make any coordination allegations and House Majority  
9 PAC denies that it coordinated on the "Listens" ad. House Majority PAC contends that it  
10 obtained the Committee video footage directly from a publicly available website, and we are  
11 aware of no facts to the contrary. Accordingly, we recommend that the Commission find no  
12 reason to believe that the Committee violated 52 U.S.C. §§ 30116(f) (formerly 2 U.S.C.

<sup>37</sup> As an independent expenditure-only committee, House Majority PAC is permitted to, and did, accept corporate contributions, contributions from labor organizations, and contributions that exceed the monetary limits of the Act. It may not, however, use those funds to make contributions, whether direct or in-kind, to a candidate's committee. While section 30118(a) (formerly 2 U.S.C. § 441b(a)) does not expressly prohibit a political committee from making a contribution using corporate funds, the provision was originally enacted on the premise that committees could not accept corporate contributions at all. In enforcing the ban on corporate contributions in the context of party committees using non-federal funds for federal activities, the Commission has taken the position that a political committee may violate section 30118(a) (formerly 2 U.S.C. § 441b(a)) by spending or disbursing corporate funds. *See, e.g.,* MUR 3774 (National Republican Senatorial Committee) (finding probable cause to believe that party committee violated 52 U.S.C. §§ 30118 (formerly 2 U.S.C. § 441(b)) and 30116(f) (formerly 2 U.S.C. § 441a(f)) and 11 C.F.R. § 102.5(a) by using prohibited and excessive funds for Get Out the Vote activities that benefited federal candidates); *FEC v. California Democratic Party*, 2004 WL 865833, Civ. No. 03-0547 (E.D. Cal. Feb. 13, 2004 (holding state party committees violated section 30118 (formerly 2 U.S.C. § 441b) and 11 C.F.R. § 102.5 by using non-federal funds to make disbursements for advertisements constituting independent expenditures)).

Because the republication of the Committee's campaign materials resulted in an in-kind contribution from House Majority PAC to the Committee, we believe it appropriate to recommend that the House Majority PAC violated 52 U.S.C. §§ 30116(a) and 30118(a) (formerly 2 U.S.C. §§ 441a(a) and 441b(a)) by using funds outside of the limits and prohibitions of the Act to make the contribution. This recommendation is consistent with our reason to believe recommendations in MURs 6617 and 6667 involving House Majority PAC's republication of another campaign's materials. *See* First GCR at n.38, MUR 6617 (Christie Vilsack for Iowa); First GCR at n.30, MUR 6667 (Friends of Cheri Bustos).

<sup>38</sup> 11 C.F.R. § 109.23(a).


§ 441a(f)) or 30118 (formerly 2 U.S.C. § 441b) by accepting excessive or prohibited in-kind contributions from House Majority PAC in connection with republished campaign materials.

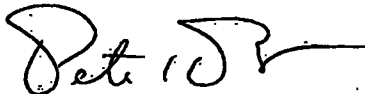
#### IV. RECOMMENDATIONS

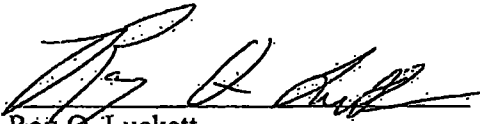
1. Find reason to believe that House Majority PAC and Shannon Roche in her official capacity as treasurer violated 52 U.S.C. §§ 30116(a) (formerly 2 U.S.C. § 441a(a)), 30118(a) (formerly 2 U.S.C. § 441b(a)), and 30104(b) (formerly 2 U.S.C. § 434(b)).

2. Find no reason to believe that Kirkpatrick for Arizona and Daniel A. Flores in his official capacity as treasurer violated 52 U.S.C. §§ 30116(f) (formerly 2 U.S.C. § 441a(f)) or 30118(a) (formerly 2 U.S.C. § 441b(a)), and close the file as to them.
3. Approve the attached Factual and Legal Analyses.
4. Enter into conciliation with House Majority PAC and Shannon Roche in her official capacity as treasurer prior to a finding of probable cause to believe.
- 5.
6. Approve the appropriate letters.

10-14-14  
Date

  
Kathleen M. Guith  
Deputy Associate General Counsel  
for Enforcement.

  
Peter G. Blumberg  
Assistant General Counsel

  
Roy Q. Luckett  
Attorney